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6 Attorneys for Plaintiff  
7 United States of America

8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 \$42,120.00 IN U.S. CURRENCY,

14 Defendant.

Case No. **'19CV1915 MMAMSB**

COMPLAINT FOR  
FORFEITURE

15  
16 By way of complaint against the defendant \$42,120.00 IN U.S. CURRENCY  
17 ("(\$42,120 in currency"), plaintiff UNITED STATES OF AMERICA alleges:

18 1. This Court has jurisdiction over this action by virtue of the provisions of  
19 Title 28, United States Code, Section 1355(a) and Title 21, United States Code,  
20 Section 881(a)(6), because the defendant \$42,120 in currency constitutes money furnished  
21 or intended to be furnished in exchange for a controlled substance, or proceeds traceable  
22 to an exchange for controlled substances in violation of Chapter 13 of Title 21,  
23 United States Code.

24 2. Venue is proper in this district pursuant to Title 28, United States Code,  
25 Section 1395 because the defendant \$42,120 in currency was found in this district.

26 3. On March 19, 2019, in the Southern District of California, at the San Diego  
27 International Airport ("SDIA"), members of the San Diego Integrated Narcotics Task Force  
28 ("NTF") Commercial Interdiction Unit were on duty, seeking to intercept and seize

1 controlled substances and proceeds from the sales of controlled substances passing though  
2 the airport.

3 A. The Task Force officers (“TFO”) were trained and experienced, and  
4 knew that persons engaged in the commercial interstate distribution of controlled  
5 substances frequently used SDIA and the aircraft that arrived and departed there to  
6 distribute controlled substances throughout the United States.

7 B. The Task Force officers were trained and experienced, and knew that  
8 persons engaged in the commercial interstate distribution of controlled substances  
9 frequently used SDIA, and the aircraft that arrived and departed there, to transport drug  
10 sales proceeds and funds to be used to purchase drugs in and out of San Diego. Those  
11 proceeds and funds were usually in the form of United States currency.

12 C. The Task Force officers were trained and experienced, and knew that  
13 persons engaged in the commercial interstate distribution of controlled substances  
14 frequently used couriers to transport controlled substances, drug sales proceeds, and funds  
15 to be used to purchase drugs in and out of San Diego. SDIA and the aircraft that arrived  
16 and departed there are relied upon as a means of sending and receiving such couriers.

17 4. On or about March 19, 2019, NTF Task Force officers and Drug Enforcement  
18 Administration (“DEA”) agents assigned to SDIA learned DARRIN FRIPP (“FRIPP”) was  
19 traveling from Greensboro, North Carolina to SDIA aboard Delta Airlines Flight 1264.

20 A. FRIPP was traveling on a one-way ticket, purchased on  
21 March 17, 2019, just two (2) days prior to departure.

22 B. FRIPP, a resident of San Diego, in the Southern District of California,  
23 did not purchase a round trip ticket for his travel to Greensboro, North Carolina and back  
24 to San Diego.

25 C. FRIPP was traveling with two (2) pieces of checked luggage.

26 D. The TFOs and DEA agents had specialized training and were  
27 experienced in investigating illegal drug and drug currency couriers. They knew the  
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1 purchase of a cross-country, one-way airline flight ticket a day or two before departure is  
2 unusual, and can be indicative the traveler is an illegal drug or drug currency courier.

3 E. The TFOs and DEA agents knew the general traveling public purchases  
4 round trip airline tickets weeks or even months in advance of the scheduled departure date.  
5 Advance purchase of round trip airline tickets results in lower fares for the traveler.  
6 Purchasing a one-way airline ticket even a week in advance of departure all but guarantees  
7 one will pay the highest fare.

8 F. The TFOs and DEA agents had specialized training and were  
9 experienced in investigating illegal drug and drug currency couriers. They knew illegal  
10 drug and drug currency couriers often times do not know when drugs or currency will be  
11 available for transport until the last minute. The nature of illegal drug trafficking, and its  
12 uncertainties, often compel couriers and their employers to purchase airline tickets close to  
13 the departure date.

14 G. The TFOs and DEA agents were trained and experienced, and knew  
15 that San Diego is a primary source region for controlled substances cultivated and  
16 manufactured on the west coast of the United States (“west coast”), Latin America,  
17 and elsewhere.

18 H. The TFOs and DEA agents were trained and experienced, and knew  
19 that controlled substances cultivated and manufactured on the west coast, in Latin America,  
20 and elsewhere were sent and distributed for resale from source regions such as San Diego  
21 to all points north and east within the United States. In their experience, the  
22 Greensboro, North Carolina region was a known destination market for  
23 controlled substances.

24 5. On March 19, 2019, just before 1:00 p.m. in SDIA Terminal Two, the TFOs  
25 and DEA agents prepared for the arrival of Delta Airlines Flight 1264 and  
26 passenger FRIPP.

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1           A.     At approximately 1:00 p.m., shortly after Delta Airlines Flight 1264  
2 arrived, the TFOs and DEA agents, armed with a physical description and a photo of  
3 FRIPP, identified him as he exited the jet way at Gate 51.

4           B.     FRIPP emerged from the aircraft carrying a small backpack.

5           6.     TFO Santana and TFO Billberry, both dressed in plain clothes, followed  
6 FRIPP as he walked toward the luggage carousel area.

7           A.     TFO Santana and TFO Billberry watched FRIPP retrieve two (2) large  
8 pieces of luggage from a carousel.

9           7.     Moments after FRIPP harvested his two (2) large pieces of luggage from the  
10 carousel, TFO Billberry approached FRIPP, identified himself as a law enforcement  
11 officer, and showed FRIPP his law enforcement credentials.

12          A.     TFO Billberry assured FRIPP he was not in trouble, and asked if the  
13 officers could speak with him about his travels.

14          B.     FRIPP was cooperative and stopped to speak with TFO Billberry.

15          C.     TFO Billberry explained to FRIPP, among other things, the SDIA NTF  
16 interdiction team just wanted to be sure FRIPP was not traveling with contraband such as  
17 illegal drugs, weapons, or large amounts of currency.

18          D.     FRIPP told TFO Billberry FRIPP just flew in from North Carolina,  
19 where he spent the last four (4) days visiting his children.

20          E.     FRIPP looked down towards his two (2) large pieces of luggage, told  
21 TFO Billberry he was carrying some money, but added it was not a large sum.

22          F.     FRIPP estimated he had \$8,000.00 in one of his pieces of luggage.

23          G.     FRIPP did not seem sure or confident about the dollar amount of  
24 currency he was transporting.

25          H.     The TFOs and agents were trained and experienced, and knew paid  
26 drug currency couriers, acting on behalf of those who traffic in controlled substances,  
27 frequently did not know the exact dollar amount of the currency they were transporting.

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1           8.     FRIPP accepted TFO Billberry's invitation to continue their conversation  
2 away from the crowds of SDIA passengers, in the privacy of the nearby SDIA Terminal  
3 Two NTF office.

4           A.     FRIPP walked with TFO Billberry to the SDIA NTF office.

5           9.     Upon arriving at the SDIA NTF office, TFO Bilberry asked FRIPP if he would  
6 remove the cash he was carrying from inside his luggage.

7           A.     FRIPP opened one (1) of his two (2) large pieces of luggage slightly,  
8 and removed a sealed brown paper envelope, approximately 8 inches by 10 inches in size.

9           B.     FRIPP handed the sealed brown paper envelope and its contents to  
10 TFO Billberry.

11           C.     TFO Billberry, in turn, presented the sealed brown paper envelope and  
12 its contents to "Voodoo", a law enforcement controlled substance detection dog.

13           D.     TFO Billberry, noted Voodoo alerted to the sealed brown paper  
14 envelope and its contents, indicating to TFO Billberry the dog detected the odor or aroma  
15 of one or more controlled substances.

16           E.     After learning Voodoo alerted to the sealed brown paper envelope,  
17 FRIPP granted TFO Billberry permission to open it and examine its contents.

18           10.    Acting on consent granted him by FRIPP, TFO Billberry opened the brown  
19 paper envelope.

20           A.     Upon opening the brown paper envelope, TFO Billberry discovered a  
21 large amount of U.S. currency.

22           11.    TFO Billberry asked FRIPP if FRIPP would consent to a search of all the  
23 pieces of luggage he was transporting.

24           A.     FRIPP expressed his consent for the TFOs and agents to search  
25 his luggage.

26           B.     The first piece of luggage to be examined was the one which contained  
27 the sealed brown paper envelope.

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1 C. A second sealed brown paper envelope, identical in appearance to the  
2 first one, was discovered inside.

3 D. The second brown paper envelope was wrapped inside articles  
4 of clothing.

5 E. Inside the second brown paper envelope was a magazine with a large  
6 amount of U.S. currency taped to many of the magazine pages.

7 F. The second piece of luggage was examined, and held two (2) more  
8 identical brown paper envelopes.

9 G. Those brown paper envelopes also held magazines with large amounts  
10 of U.S. currency taped to many pages of the magazines.

11 12. TFO Billberry asked FRIPP how much currency he was transporting.

12 A. FRIPP told TFO Billberry \$12,000.00 belonged to FRIPP, and the  
13 remainder belonged to someone FRIPP referred to as “my boy Anton.”

14 B. FRIPP declined to identify “Anton” or give any contact information  
15 for him.

16 C. FRIPP estimated he was carrying a total of approximately \$30,000.00.

17 D. The TFOs and agents were trained and experienced, and knew paid  
18 drug currency couriers, acting on behalf of those who traffic in controlled substances,  
19 frequently did not know the exact dollar amount of the currency they were transporting.

20 13. TFO Billberry noted FRIPP was traveling with a cellular telephone.

21 A. TFO Billberry asked FRIPP for permission to examine the contents of  
22 FRIPP’S cellular telephone.

23 B. FRIPP granted consent to TFO Billberry to examine the contents of  
24 FRIPP’S cellular telephone.

25 C. While TFO Billberry asked FRIPP for permission to examine FRIPP’S  
26 cellular telephone, TFO Billberry and NTF Group Supervisor Williams noted FRIPP  
27 busied himself deleting text messages on the phone.

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1 D. FRIPP told TFO Billberry he was traveling with a second cellular  
2 telephone, and granted TFO Billberry permission to examine the contents of the  
3 second phone.

4 E. FRIPP handed the two (2) cellular telephones to TFO Billberry who, in  
5 turn, handed the phones to DEA Special Agent Beauchamp.

6 14. On one (1) of the two (2) cellular telephones, DEA Special Agent Beauchamp  
7 discovered a photo of a large brick of marijuana, a Schedule I Controlled Substance.

8 A. Among FRIPP'S phone contacts, Agent Beauchamp located  
9 information regarding a marijuana dispensary referred to as "CBD."

10 15. The TFOs and agents examined the contents of FRIPP'S two (2) large pieces  
11 of luggage.

12 A. The TFOs and agents noted the bags held only a few articles of clothing,  
13 a bed pillow, but were otherwise virtually empty.

14 B. TFO Billberry knew checking two (2) large pieces of luggage required  
15 FRIPP to pay a premium to the airline.

16 16. The currency discovered in the two (2) large pieces of luggage was combined,  
17 counted, and determined to have a dollar value of \$42,120.00.

18 A. The \$42,120.00 discovered in the two (2) large pieces of luggage is the  
19 defendant \$42,120 in currency.

20 17. The TFOs and DEA agents gathered, examined, and counted the defendant  
21 \$42,120 in currency found concealed inside the two (2) large pieces of luggage.

22 A. The defendant \$42,120 in currency was made up of approximately  
23 1,929 bills in a variety of denominations.

24 B. The great majority of the bills, to wit, 1,768, were of the \$20.00  
25 denomination.

26 18. The TFOs and DEA agents had specialized training and were experienced in  
27 investigating illegal drug traffickers and drug currency couriers. They knew illegal street  
28 drug sales were virtually always conducted as an exchange of drugs for currency.



1           A.    The most common denomination used in illegal street drug transactions  
2 was the \$20.00 bill.

3           B.    Approximately 91% of the defendant \$42,120 in currency was made up  
4 of \$20.00 bills.

5           19.   The defendant \$42,120 in currency was seized for forfeiture by the DEA as  
6 currency constituting proceeds of the purchase(s) of controlled substances, and money  
7 possessed with the intent to be furnished in exchange for controlled substances.

8           20.   TFO Billberry examined FRIPP'S national criminal history record.

9           A.    On or about December 10, 2009, in Dekalb County, Georgia, before the  
10 Dekalb County Superior Court, FRIPP was convicted of purchase / possession of a  
11 controlled substance, a felony.

12           21.   The defendant \$42,120 in currency constitutes money furnished or intended  
13 to be furnished in exchange for a controlled substance, in violation of Chapter 13, Title 21,  
14 United States Code.

15           22.   Alternatively, the defendant \$42,120 in currency constitutes proceeds of, or  
16 proceeds traceable to, an exchange for a controlled substance, in violation of Chapter 13,  
17 Title 21, United States Code.

18           23.   Alternatively, the defendant \$42,120 in currency was used or intended to be  
19 used to facilitate an exchange for a controlled substance, in violation of Chapter 13,  
20 Title 21, United States Code.

21           24.   As a result of the foregoing, the defendant \$42,120 in currency is liable to  
22 condemnation and to forfeiture to the United States for its use in accordance with Title 21,  
23 United States Code, §881(a)(6).

24           25.   The defendant \$42,120 in currency is presently deposited within the  
25 jurisdiction of this Court.

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1 WHEREFORE, the United States prays that due process issue to enforce the  
2 forfeiture of the defendant \$42,120 in currency, and that due notice be given to all  
3 interested parties to appear and show cause why said forfeiture should not be declared.

4 DATED: October 2, 2019

5 ROBERT S. BREWER, JR.  
6 United States Attorney

7 s/ Bruce C. Smith  
8 BRUCE C. SMITH  
9 Assistant U.S. Attorney  
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## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

United States of America

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

AUSA Bruce C. Smith, Phone: (619) 546-8266

USAO, 880 Front Street, Room 6293, San Diego, CA 92101-8893

**DEFENDANTS**

\$42,120.00 in U.S. Currency

County of Residence of First Listed Defendant \_\_\_\_\_  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

Attorneys (If Known) **'19CV1915 MMAMSB****II. BASIS OF JURISDICTION**

(Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES**

(For Diversity Cases Only)

- |   | PTF                        | DEF                        |  | PTF                        | DEF                        |
|---|----------------------------|----------------------------|--|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated <i>or</i> Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated <i>and</i> Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation   | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT**

(Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights <b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition			

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from another district (specify)  
☐ 6 Multidistrict Litigation  
☐ 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

21 U.S.C. Section 881

Brief description of cause:  
Narcotics trafficking**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

10/02/2019

s/ Bruce C. Smith

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

VERIFICATION

I, Daniel Billberry, state and declare as follows:

1. I am a Task Force Officer, assigned to a San Diego Integrated Narcotics Task Force, Team 8, and am one of the task force officers assigned to this investigation.

2. I have read the foregoing Complaint For Forfeiture and know its contents.

3. The facts set forth in the Complaint For Forfeiture are based upon my own knowledge or were facts furnished to me by other United States federal, state, or local law enforcement personnel, civilian witnesses, or other official Government sources.

Based on this information, I believe the allegations in the Complaint For Forfeiture to be true.

I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge and belief.

Executed on October 2, 2019.

  
DANIEL BILLBERRY, TFO  
NTF TEAM 8